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June 20, 2023

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By ECF

Honorable Katherine Polk Failla  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, NY 10007

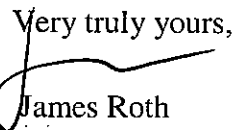
Re: *United States v. Abuchi Felix*, 21 Cr. 472 (KPF)

Dear Judge Failla:

**MEMO ENDORSED**

I write to renew a prior application which was denied requesting permission for Mr. Abuchi Felix to travel on July 24 -31, 2023 to Norway to visit his two children and their mother who reside there. Since the prior application, Mr. Felix's daughter suffered a seizure that required emergency hospitalization and continued monitoring to this date. From the date that Your Honor permitted Mr. Felix to seek employment, he has been gainfully employed as a training consultant for various healthcare companies. His employment has required him to travel to locations in various states across the country. His job generally requires him to work six or seven days at a time. He is well-remunerated for his services and has maintained excellent job evaluations.

Mr. Felix has been fully compliant with all the terms of his supervision for over two years. We submit, now that Mr. Felix has entered a guilty plea, he has a greater stake in returning to court as required rather than facing the maxim statutory penalties in the event that he should fail to appear as required. We recognize that this request is unusual. However, the cost of his family traveling to the United States is prohibitively expensive, he has no place to house them and his wife is unable to obtain leave from her employment. Under the circumstances, we believe this request is well-reasoned and justified. Probation defers to the court. The Government opposes this application position.

Very truly yours,  
  
James Roth

cc. AUSA Matthew King  
PTO Francesca Tessier- Miller

Application DENIED. Although the Court is sad to hear of Mr. Felix's daughter's condition, its views on this matter have not changed since last considering this request in November.

The Clerk of Court is directed to terminate the pending motion at docket entry 238.

Dated: June 21, 2023  
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla". The signature is written in a cursive, flowing style.

HON. KATHERINE POLK FAILLA  
UNITED STATES DISTRICT JUDGE